

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO:	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
<i>Tabitha Mueller v. Ethicon, Inc., et al.</i> Case No. 2:15-cv-14871	

**PLAINTIFF’S DESIGNATION AND DISCLOSURE OF
GENERAL AND CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiff Tabitha Mueller (herein after “Plaintiff”) submits the following Designation and Disclosure of Expert Witnesses and persons who may provide expert testimony pursuant to Rule 702 of the Federal Rules of Evidence. Plaintiff reserves the right to elicit testimony, either through direct examination or cross- examination, of all witnesses designated or identified by Plaintiff or Defendants as an expert or person with specialized knowledge, training, or experience. Plaintiff further reserves the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

GENERAL RETAINED EXPERTS

- 1) Daniel Elliott, M.D. (Urologist)
Mayo Clinic
200 1st Street SW
Rochester, MN 55902

Plaintiff refers Defendants to Dr. Elliott's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Elliott's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Elliott, the exhibits that Dr. Elliott may use to support his opinions, and Dr. Elliott's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Elliott's Expert Reports and all subparts and attachments thereto.

- 2) Peggy C. Pence, PhD, RAC, FRAPS
3537 Old Conejo Road
Newbury Park, CA 91320
(805) 214-3700

Plaintiff refers Defendants to Dr. Pence's Expert Reports, and all subparts and attachments thereto which sets forth her opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Pence's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Pence, the exhibits that Dr. Pence may use to support his opinions, and Dr. Pence's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Pence's Expert Reports and all subparts and attachments thereto.

- 3) Bruce A. Rosenzweig, M.D. (Urogynecologist)
Rush University Professional Building
1725 West Harrison Street, Suite 358
Chicago, IL 60612

Plaintiff refers Defendants to Dr. Rosenzweig's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Rosenzweig's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Rosenzweig, the exhibits that Dr. Rosenzweig may use to support his opinions, and Dr. Rosenzweig's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Rosenzweig's Expert Reports and all subparts and attachments thereto.

- 4) Prof. Dr. med Uwe P. Klinge
Pauwelsstr. 30
52074 Aachen
Nordrhein-Westfalen
Deutschland
0241/80-89501

Plaintiff refers Defendants to Dr. Klinge's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Klinge's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Klinge, the exhibits that Dr. Klinge may use to support his opinions, and Dr. Klinge's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Klinge's Expert Reports and all subparts and attachments thereto.

CASE SPECIFIC RETAINED EXPERTS

- 1) Keith Reeves, M.D.
4846 McDermid Drive
Houston, Texas 77035

Plaintiff refers Defendants to Dr. Reeves' Expert Report, which is being served contemporaneously with this disclosure or by way of separate e-mail today, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. Dr. Reeves' Expert Report and corresponding attachments set forth the facts, data and information considered by Dr. Reeves, the exhibits that Dr. Reeves may use to support his opinions, and Dr. Reeves' qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Reeves Expert Report and all subparts and attachments thereto.

NON-RETAINED EXPERTS

- 1) Sarah Kane, M.D.
Norton Urogynecology Center
4123 Dutchmans Lane #307
Louisville, KY 40207
(502) 409-5600

It is expected that Dr. Kane will testify that she was the physician who implanted the TVT, and also performed the sling release for Ms. Mueller. Dr. Kane's opinions will be those as set forth and testified to in her medical records in their entirety as if fully set forth herein.

Plaintiff reserves the right to call any expert disclosed by any other party and thereafter deposed. Plaintiff also reserves the right to call additional, undesignated expert witnesses as allowed by law and in particular, any of Plaintiff's medical providers. Plaintiff further reserves the right to supplement the above list should another party disclose experts in areas other than those covered by the above individuals.

- 2) Mark J. Swofford, M.D.
911 Bypass Road
Pikeville, KY 41501
(606) 218-2202

Dr. Swofford is expected to testify that he was the surgeon who initially recommended removal of the TVT mesh from Ms. Mueller, but does not perform the procedure. It is expected that Dr. Swofford's opinions will be those as set forth and testified to in his medical records in their entirety as if fully set forth herein.

Plaintiff reserves the right to call any expert disclosed by any other party and thereafter deposed. Plaintiff also reserves the right to call additional, undesignated expert witnesses as allowed by law and in particular, any of Plaintiff's medical providers. Plaintiff further reserves the right to supplement the above list should another party disclose experts in areas other than those covered by the above individuals.

3) William J. Todia, M.D.
2500 Metrohealth Drive
Cleveland, OH 44109

Dr. Todia is expected to testify that he was the surgeon who performed a hysterectomy at the time the TVT Sling was placed by Dr. Sarah Kane. It is expected that Dr. Todia's opinions will be those as set forth and testified to in his medical records in their entirety as if fully set forth herein.

Plaintiff reserves the right to call any expert disclosed by any other party and thereafter deposed. Plaintiff also reserves the right to call additional, undesignated expert witnesses as allowed by law and in particular, any of Plaintiff's medical providers. Plaintiff further reserves the right to supplement the above list should another party disclose experts in areas other than those covered by the above individuals.

Dated: December 13, 2017

Respectfully submitted,

/s/Michelle Eddington

Michelle Eddington

McDonald Worley, PC

1770 St. James Place, Suite 100

Houston, Texas 77056

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2017, I electronically served the foregoing document to all counsel of record.

/s/Michelle Eddington
Michelle Eddington